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Attorneys for Plaintiffs
ALLERGAN USA, INC. and
ALLERGAN INDUSTRIE, SAS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ALLERGAN USA, INC. and
ALLERGAN INDUSTRIE, SAS,

Plaintiffs,

v.

MEDICIS AESTHETICS, INC.,
MEDICIS PHARMACEUTICAL CORP.,
VALEANT PHARMACEUTICALS
NORTH AMERICA LLC,
VALEANT PHARMACEUTICALS
INTERNATIONAL, VALEANT
PHARMACEUTICALS
INTERNATIONAL, INC., AND
GALDERMA LABORATORIES, L.P.

Defendants.

Case No. SACV13-01436 AG (JPRx)

DISCOVERY MATTER

DECLARATION OF ELIZABETH M.
FLANAGAN IN SUPPORT OF JOINT
STIPULATION REGARDING
PLAINTIFFS' MOTION TO COMPEL

Judge: Hon. Jean P. Rosenbluth
Hearing: February 26, 2015
Time: 10:00 a.m.
Ctmm: A-8th Floor

Discovery cutoff date: April 10, 2015
Pretrial conference date: July 20, 2015
Trial date: August 4, 2015

1 I, Elizabeth M. Flanagan, declare as follows:

2 1. I am an attorney at Fish & Richardson P.C., and have been admitted
3 *pro hac vice* in the above-captioned litigation as counsel for Plaintiffs Allergan
4 USA, Inc., and Allergan Industrie, SAS (“Allergan”).

5 2. Attached hereto as Exhibit 1 is a true and correct copy of
6 correspondence from Plaintiffs’ counsel to Defendants’ counsel, dated January 14,
7 2015.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of the
9 Scheduling Order Specifying Procedures (Document 34), dated February 3, 2014.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of the Order
11 Granting Stipulation to Amend Scheduling Order Specifying Procedures (Document
12 78), dated August 4, 2014.

13 5. Attached hereto as Exhibit 4 is a true and correct copy of the Order
14 Granting Stipulation to Amend the Scheduling Order Specifying Procedures
15 (Document 107), dated January 14, 2015.

16 6. Attached hereto as Exhibit 5 is a true and correct copy of Defendants’
17 Revised List of Potential E-Mail Custodians, dated June 18, 2014.

18 7. Attached hereto as Exhibit 6 is a true and correct copy of the Initial
19 Disclosures of Galderma Laboratories, L.P., served December 29, 2014.

20 8. Attached hereto as Exhibit 7 is a true and correct copy of email
21 correspondence from Defendants’ counsel to Plaintiffs’ counsel, dated January 15,
22 2015.

23 9. Attached hereto as Exhibit 8 is a true and correct copy of redacted
24 email correspondence between Plaintiffs’ counsel and Defendants’ counsel, dated
25 October 13, 2014 through October 15, 2014.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on February 5, 2015 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Civil Local Rule 5.4. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery.

/s/ Elizabeth M. Flanagan
Elizabeth M. Flanagan